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Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT
for the
District of Oregon

CITY OF EugeneCIVDivision

<u>CLAUDE D. SIMPSON; HENRY-</u>)	Case No.	<u>16:19-cv-154-MC</u>	
<u>SMITH; JAMES AGGREY-KWEGGYIRR ARUNGA</u>)	<i>(to be filled in by the Clerk's Office)</i>		
<i>Plaintiff(s)</i>)			
<i>(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)</i>)	Jury Trial:	(check one)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
-v-)			
<u>SANDY ALEXAN-</u>)			
<u>DER; JOHN ALEXANDER; SANDY & JOHN ALEX-</u>)			
<u>ANDER; ALEXANDERS' TORTFEASOR-CLIENTELE</u>)			
<i>Defendant(s)</i>)			
<i>(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)</i>)			

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Claude D. Simpson, Victim-Plaintiff</u>
Name	<u>Henry Smith, Victim-Plaintiff</u>
Name	<u>James Aggrey-Kweggyirr Arunga, Victim-Plaintiff</u>
Street Address	<u>4531 Franklin Blvd</u>
City and County	<u>Eugene, Lane County</u>
State and Zip Code	<u>Oregon 97403</u>
Telephone Number	
Mailing Address	<u>SIMPSON SMITH ARUNGA Pro Se,</u>
	<u>Post Office Box 11521</u>
	<u>Eugene, OR 974403721</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

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Defendant No. 1

Name	Sandy Alexander
Job or Title (<i>if known</i>)	Alexander MBH/RV Management
Street Address	4531 Franklin Blvd, Space-3
City and County	Eugene, Lane County
State and Zip Code	Oregon 97403
Telephone Number	Unknown
E-mail Address (<i>if known</i>)	Unknown

Defendant No. 2

Name	John Alexander
Job or Title (<i>if known</i>)	Alexander MBH/RV Maintenance
Street Address	4531 Franklin Blvd, Space-3
City and County	Eugene, Lane County
State and Zip Code	Oregon, 97403
Telephone Number	Unknown
E-mail Address (<i>if known</i>)	Unknown

Defendant No. 3

Name	Sandy & John Alexander
Job or Title (<i>if known</i>)	Alexander MBH/RV Assistants
Street Address	4531 Franklin Blvd, Space-3
City and County	Eugene, Lane County
State and Zip Code	Oregon 97403
Telephone Number	Unknwn
E-mail Address (<i>if known</i>)	Unknown

Defendant No. 4

Name	Sandy & John Alexander
Job or Title (<i>if known</i>)	Alexanders' Tortfeasors-Clientele
Street Address	4531 Frabklin Blvd, Space-3
City and County	Eugene, Lane County
State and Zip Code	Oregon 97403
Telephone Number	Unknown
E-mail Address (<i>if known</i>)	Unknown

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Also, 18U.S.C. Sections 241 & 242 et seq. for Tortcases under 18:249, 1956 & 1957 et seq.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. First and Fourteenth Amendments of Bill of Rights

18U.S.C. Section 249 Hate Crime Acts-Action-and Activities;

III. Statement of Claim 18U.S.C. Sections 1956 & 1957 et seq.Rico penalties against involved perpetrators.

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

PURVIEW: Plaintiff Claude D. Simpson is 89-years old disabled and senior retired veteran; Plaintiff Henry Smith is disabled retired senior veteran; and, James Aggrey-Kweggyirr Arunga is 81-years old disabled and retired humanitarian. Plaintiffs do not have any criminal nor civil violation's record; Plaintiffs-victims do not believe in violations of: local government ordinance(s); state laws; and, United States Law and the Constitution, thereby, known. Accordingly, Plaintiffs are, have and will not be intimidated by mobs composite defendants:-- convicted felons, and or participate in illegal drugs and human traffickings, including marijuana and recreational marijuana blackmarketing. That, defendants are organized HateCrimeVagabond-Perpetrators operating their illegal businesses from the states of California, Oregon, Washington; that said are herein, referred to as "Alexanders' Tortfeasors-Clientele".

1st Claim: (a) On August 1, 2017, Plaintiff Claude D. Simpson was attacked at his Shamrock MBH/RV Village, 4531 Franklin Blvd, Eugene, Oregon by hate defendantstortfeasors housed and harbored at said MBH/RV Village, Spaces#sA and D, that are designated, by defendants Sandy and John Alexander, in their management and maintenance capacity to house and harbor said defendantstortfeasors(at Spaces #sA and D). Plaintiff Claude D. Simpson sustained and continue to suffer from permanent mental anguish and physical heinous pains from August 1, 2017--. Appendix-Fact 1 of 6 attached.

(b) On September 30, 2018 ,Plaintiff Henry Smith was physically attacked at his Shamrock MBH/RV Village, 4531 Franklin Blvd, Eugene, Oregon, by hate defendantstortfeasors housed and harbored at said MBH/RV Village, Spaces#sA and D that are designated, by defendants Sandy and John Alexander, in their management and maintenance capacity to house and harbor said defendantstortfeasors(at Spaces #s A and D).. Plaintiff Henry Smith sustained and continue

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to suffer from permanent mental anguish and heinous physical injurious pains from September 30, 2018--. Appendixes-Fact 2 & 3 of 6 attached.

- (c) On November 18, 19 and 20, 2018, Plaintiff James Aggrey-Kweggyirr Arunga was harassed while at his Shamrock MBH/RV Village, 4531 Franklin Blvd, Eugene, Oregon, by hate defendantstortfeasors housed and harbored at said MBH/Village, 4531 Franklin Blvd, Spaces#s 3, 14, 15, 18, 23 and 25 that are designated, by Sandy Alexander and John Alexander, in their management and maintenance capacity to house and harbor said defendantstortfeasors(at Spaces#s 3, 14, 15, 18, 23 and 25). Plaintiff James Aggrey-Kweggyirr Arunga sustained and continue to suffer from heinous mental anguish and physical pains from Novemeber 18, 2018--. Appendix-Fact 4 of 6 attached.

- 2d Claim: (a) Plaintiffs' pains and sufferings, caused by defendantstortfeasors against them, invoke this Court to grant plaintiffs-victims due process of law; and,
 (b) to entitle Plaintiffs monetary damages(actual and retribution), under Title 18U.S.C. Sections 249, 1956-1957 et seq.).

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff-victim Claude D. Simpson requests relief in the amount of \$1.0Mil. for pain(s) and suffering(s), against defendantstortfeasors-- Sandy Alexander, Alexander MBH/RV Management; John Alexander, Alexander MBH/RV Maintenance; Sandy and John Alexander, Alexander Assistants and Alexanders' Tortfeasors, in actual damages; and, \$0.5Mil. in retribution against said defendantstortfeasors. Note: Shamrock MBH/RV and owner of Shamrock MBH/RV property are not part of this tortcase.

Plaintiff-victim Henry Smith requests relief in the amount of \$1.0Mil. for pain(s) and suffering(s), against defendantstortfeasors--Sandy Alexander, Alexander MBH/RV Management; John Alexander, Alexander MBH/RV Maintenance; Sandy and John Alexander, Alexander Assistants and Alexanders' Tortfeasors, in actual damages; and, 0.5Mil. in retribution against said defendantstortfeasors. Note: Shamrock MBH/RV and owner of Shamrock MBH/RV property are not part of this tortcase.

Plaintiff-victim James Aggrey-Kweggyirr Arunga request relief in the amount of \$1.0Mil. for pain(s) and suffering(s), against defendantstortfeasors-- Sandy Alexander, Alexander MBH/RV Management; John Alexander, Alexander MBH/RV Maintenance; Sandy and John Alexander Alexander Assistants and Alexanders' Tortfeasors; in actual damages; and, 0.5Mil. in retribution against said defendantstortfeasors. Note: Shamrock MBH/RV and owner of Shamrock MBH/RV property are not part of this tortcase.

Plaintiffs request \$1.0Mil. for other costs, including medical bills they may incur, because of defendantstortfeasors' hatecrime acts executed against them(plaintiffs-victims).

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: January 25, 2019

Signature of Plaintiff

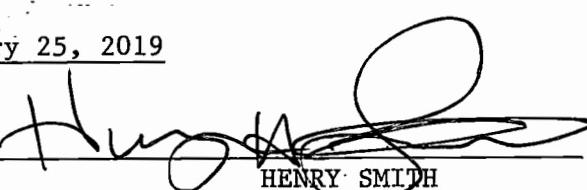


CLAUDE D. SIMPSON

Printed Name of Plaintiff

Date of Signing January 25, 2019

Signature of Plaintiff



HENRY SMITH

Print Name of Plaintiff

Date of Signing January 25, 2019

Signature of Plaintiff



JAMES AGGREY-KWEGGYIRR ARUNGA

Print Name of Plaintiff